

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK (BROOKLYN DIVISION)

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IN RE: Herman Segal,

Case No. 13-45519-nhl

Chapter 7

NOTICE OF MOTION FOR RELIEF
FROM THE AUTOMATIC STAY OR IN
THE ALTERNATIVE A DECLARATORY
JUDGEMENT THAT THERE IS NO
STAY IN EFFECT WITH RESPECT TO
THE DEBTOR'S OCCUPANCY AT THE
PREMISES KNOWN AS 4115 QUENTIN
ROAD, BROOKLYN, NEW YORK

Debtor
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**NOTICE OF MOTION FOR AN ORDER GRANTING DECLARATORY RELIEF THAT
THERE IS NO STAY IN EFFECT WITH RESPECT TO THE DEBTOR'S OCCUPANCY
AT THE PREMISES KNOWN AS 4115 QUENTIN ROAD, BROOKLYN, NEW YORK,
OR IN THE ALTERNATIVE, MODIFYING THE AUTOMATIC STAY TO PERMIT
APPLICANT TO EXECUTE ON AN EVICTION JUDGEMENT**

PLEASE TAKE NOTICE that upon the application dated September 24, 2019, (the "Application"), Interested Party Quentin Manor, LLC, by its attorneys, Shiryak, Bowman, Anderson Gill, & Kadochnikov, LLP, shall move before the Honorable Nancy Hershey Lord, United States Bankruptcy Judge in the Courtroom located at the United States Bankruptcy Court for the Eastern District of New York, located at 271C Cadman Plaza East, Courtroom 3577, Brooklyn, New York 11201, **on October 10, 2019 at 2:00pm**, or as soon thereafter as counsel may be heard, for entry of an order pursuant to 11 U.S.C. §§362(a)(1)&(c)(2)(C), for a declaratory judgement confirming that there is no stay in effect with respect to the Debtor's occupancy at the premises known as 4115 Quentin Road, Brooklyn, New York, ("Subject Property"), or in the alternative, relief from the automatic stay to permit Quentin Manor to

execute on a warrant of eviction removing Debtor from the Subject Property, and for such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief herein requested shall be in writing, shall state with particularity the grounds for the objection, shall be filed with the Clerk of the Bankruptcy Court and served upon, the undersigned counsel for the Applicant by **the return date** and upon any other person whose interests would be affected if the objection is sustained.

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned from time to time without further notice other than the announcement of such adjournment in open Court;

PLEASE TAKE FURTHER NOTICE, that you need not appear at the Hearing if you do not object to the relief requested in the Motion.

Dated: Kew Gardens, New York
October 3, 2019

/s/ Btzalel Hirschhorn, Esq. _____
Btzalel Hirschhorn, Esq.
Shiryak.Bowman, Anderson, Gill & Kadochnikov, LLP
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